

Exhibit 1

*** HIGHLY CONFIDENTIAL ***

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Case No. 3:07-cv-05944 SC

MDL No. 1917

-----x

IN RE: CATHODE RAY TUBE (CRT)

ANTITRUST LITIGATION

-----x

This Document Relates to:

ALL ACTIONS

-----x

Taipei 101 Tower
Xinyi Road
Taipei City, 11049
Taiwan

February 19, 2013

9:41 a.m.

Volume I of III

DEPOSITION of CHIH CHUN-LIU, held at the
aforementioned time and place, before Audrey
Shirley, Qualified Realtime Reporter, MBIVR

09:54:32:000 1 Q. All right. And after 2000, what was
09:54:36:000 2 your next position at Chunghwa?

09:54:43:000 3 A. Sales VP, Vice President.

09:54:46:000 4 Q. And how long were you sales VP at
09:54:50:000 5 Chunghwa?

09:54:57:000 6 A. Till the time I retired.

09:54:59:000 7 Q. So, from approximately 2000 to 2005 you
09:55:03:000 8 served as sales VP for Chunghwa?

09:55:17:000 9 A. Yes.

09:55:17:001 10 Q. And when you were sales manager what
09:55:22:000 11 was your duties and responsibilities as sales
09:55:25:000 12 manager from approximately 1992 to 2000, please?

09:55:58:000 13 A. My responsibilities covered the sales
09:56:03:000 14 activities and the market situations of all the
09:56:11:000 15 CPT's products.

09:56:16:000 16 Q. And what were CPT's products at this
09:56:22:000 17 time?

09:56:59:000 18 A. I cannot say for sure the sequence of
09:57:05:000 19 products into the market but generally they were
09:57:24:000 20 black and white TV tubes, monochrome display
09:57:29:000 21 tubes, color picture tubes, color display tubes
09:57:33:000 22 and, in the later stage, LCDs.

09:57:37:000 23 It was not the sequence, I cannot remember
09:57:43:000 24 the timing of those products into the market.

09:57:53:000 25 Q. When you served as sales director from

10:36:52:001 1 A. Culture?

10:37:07:000 2 Q. Yes. What I -- sorry, go ahead.

10:37:57:000 3 A. Chunghwa picture tubes has been a local

10:38:04:000 4 Taiwanese company, even though it is a listed

10:38:09:000 5 company it is a Lin family enterprise. Company

10:38:34:000 6 is a subsidiary of Tatung company. Founder T. S.

10:38:43:000 7 Lin was an entrepreneur of nationalism; the

10:38:56:000 8 company started right after the government moved

10:38:58:000 9 to Taiwan, so it focused on integrity, honesty,

10:39:04:000 10 diligence and conservation. I think it has been

10:39:17:000 11 very prone to features like a family enterprise.

10:39:43:000 12 Q. Are you done? I'm sorry.

10:39:47:000 13 THE INTERPRETER: Yes.

10:39:52:000 14 THE WITNESS: I don't know what you are

10:39:59:000 15 asking about so I give you a very rough answer.

10:40:02:000 16 BY MR. SAVERI:

10:40:03:000 17 Q. No, thank you, that was what I was

10:40:04:000 18 looking for, thank you. So is the Lin family

10:40:06:000 19 very involved then in the Chunghwa company?

10:40:21:000 20 MR. LAU: Objection; vague.

10:40:27:000 21 THE WITNESS: Yes.

10:40:27:001 22 BY MR. SAVERI:

10:40:29:000 23 Q. And you've indicated you reported to

10:40:31:000 24 C.Y. Lin at the end of your career; is that

10:40:34:000 25 correct?

10:40:34:000 1 A. Not later half of my career. I almost
10:41:00:000 2 reported to him throughout the years directly.

10:41:07:000 3 Q. And how would you describe Mr. C.Y. Lin
10:41:10:000 4 as President? Is he a hands-on President? Is he
10:41:13:000 5 hands-off? How would you describe Mr. C.Y. Lin
10:41:18:000 6 as President?

10:42:13:000 7 A. C.Y. Lin is very smart, highly capable.
10:42:22:000 8 He is a very loved son of the -- of his father.
10:42:31:000 9 His father gave him great powers. But for
10:42:38:000 10 interference he would have managed the company to
10:42:44:000 11 great success. He is a person of strong
10:42:52:000 12 efficiency. He has all the major points in
10:43:03:000 13 control, but he does not oversee every details.

10:43:18:000 14 Q. During the period of time when you
10:43:21:000 15 reported to Mr. C.Y. Lin, on any major pricing
10:43:28:000 16 decision would you have to get approval from
10:43:30:000 17 Mr. Lin?

10:43:45:000 18 MR. TALADAY: Objection; vague.

10:44:27:000 19 THE WITNESS: I reported to him from time
10:44:29:000 20 to time, not necessarily for his approvals. The
10:44:35:000 21 pricing or the prices in the market were very
10:44:40:000 22 clear. Actually I can decide on my own for 80 to
10:44:57:000 23 90 per cent of the decisions. I reported to him
10:45:00:000 24 simply for his references.

10:45:04:000 25 BY MR. SAVERI:

12:38:12:000 1 MR. TALADAY: Objection; vague.

12:38:59:000 2 MR. ALPREN: You're referring to reports of

12:39:01:000 3 the meetings?

12:39:01:001 4 MR. SAVERI: Yes.

12:39:15:000 5 THE WITNESS: Yes.

12:39:15:001 6 BY MR. SAVERI:

12:39:15:002 7 Q. And then if it was a significant report

12:39:18:000 8 from the meeting, would you then pass it along up

12:39:22:000 9 to Mr. C.Y. Lin?

12:39:25:000 10 MR. TALADAY: Objection; vague and

12:39:29:000 11 ambiguous.

12:39:37:000 12 THE WITNESS: Yes.

12:39:38:000 13 BY MR. SAVERI:

12:39:39:000 14 Q. And would Mr. Lin then sign off on the

12:39:42:000 15 note to indicate that he had reviewed and

12:39:44:000 16 approved the meeting report from the group

12:39:48:000 17 meeting?

12:39:49:000 18 MR. LAU: Objection; calls for speculation.

12:39:54:000 19 MR. TALADAY: Objection; leading.

12:40:12:000 20 THE WITNESS: Yes.

12:40:13:000 21 BY MR. SAVERI:

12:40:13:001 22 Q. And then would the report from the

12:40:15:000 23 group meeting go back down to the individual at

12:40:21:000 24 Chunghwa who drafted the report?

12:40:24:000 25 MR. TALADAY: Objection; leading.

12:40:24:000 1 THE WITNESS: Yes, because after that it

12:40:54:000 2 will be -- the contents will be implemented.

12:41:00:000 3 BY MR. SAVERI:

12:41:00:001 4 Q. So when the report then comes back down

12:41:03:000 5 from, say, Mr. C.Y. Lin or yourself, the contents

12:41:08:000 6 would be implemented at Chunghwa; is that

12:41:11:000 7 correct?

12:41:25:000 8 MR. LAU: Objection; asked and answered.

12:41:30:000 9 MR. O'CONNOR: And leading.

12:41:32:000 10 THE WITNESS: Correct.

12:41:34:000 11 BY MR. SAVERI:

12:41:34:001 12 Q. And then are the reports maintained in

12:41:38:000 13 the ordinary course of business at Chunghwa?

12:41:51:000 14 MR. LAU: Objection; leading. Objection;

12:41:53:000 15 calls for a legal conclusion.

12:41:55:000 16 MR. TALADAY: Objection; vague.

12:42:00:000 17 THE WITNESS: Yes.

12:42:02:000 18 BY MR. SAVERI:

12:42:02:001 19 Q. And is the process you describe about

12:42:05:000 20 drafting the reports, reviewing them, sending

12:42:09:000 21 them to Mr. C.Y. Lin and then sending them back

12:42:14:000 22 to the draftee, the custom and practice at

12:42:18:000 23 Chunghwa regarding meeting reports from the group

12:42:27:000 24 meetings?

12:42:27:001 25 MR. O'CONNOR: Objection; misstates prior

12:42:27:001 1 testimony.

12:42:33:000 2 THE WITNESS: Yes.

12:42:58:000 3 BY MR. SAVERI:

12:42:58:001 4 Q. And was this the practice that was done
12:43:01:000 5 after every glass meeting or group meeting?

12:43:15:000 6 A. Yes.

12:43:16:000 7 MR. SAVERI: I think we're at a break.

12:43:19:000 8 We're off the record.

12:43:19:001 9 THE VIDEOGRAPHER: Going off the record,
12:43:30:000 10 the time is 12:43.

12:43:33:000 11 (Luncheon recess was taken at 12:43 p.m.)

13:46:26:000 12 THE VIDEOGRAPHER: This marks the beginning
13:48:54:000 13 of videotape No. 3. Back on the record, the time
13:48:58:000 14 is 1:48.

13:49:01:000 15 BY MR. SAVERI:

13:49:02:000 16 Q. Mr. Liu, when we -- what we were
13:49:07:000 17 talking about just before break were the reports
13:49:10:000 18 that were made of the group meetings or glass
13:49:14:000 19 meetings and how those reports were then written
13:49:18:000 20 up and then moved up the chain of -- from whoever
13:49:23:000 21 drafted them or to you or C.Y. Lin and then back
13:49:28:000 22 to the person who drafted them for the purpose of
13:49:31:000 23 implementing them and my question is this: was
13:49:35:000 24 the material in the reports, was that relied on
13:49:41:000 25 by Chunghwa in the ordinary course of running its